

### ARGUMENTS/REMARKS

Applicants would like to thank the examiner for the careful consideration given the present application. The application has been carefully reviewed in light of the Office action, and amended as necessary to more clearly and particularly describe and claim the subject matter which applicants regard as the invention.

Claims 1, 3-13, and 15-22 remain in this application. Claims 2 and 14 have been canceled. Claims 5-9, 11, 13, and 15-21 have been indicated by the Examiner as being allowable.

Claims 1, 3, 4, 10, 12 and 22 were rejected under 35 U.S.C. §102(b) as being anticipated by Morgan (U.S. 4,992,866). For the following reasons, the rejection is respectfully traversed.

Claim 1, as amended, recites a "camera-to-be-operated determination section" which:

determines a camera to be panned on the basis of an *angle* between an imaginary line connecting the center of the camera symbol with the designated location and an imaginary line connecting the center of the camera symbol with the direction in which the camera is currently oriented

(emphasis added). Thus, the invention according to claim 1 chooses a camera to be panned, in effect, based on examining the *angle* between the desired direction and the current direction of each camera. The reference does not teach this.

Instead, the reference clearly teaches that, in automatic mode, its camera is chosen solely based on which camera is *closest* to the desired target chosen by the operator. See Fig. 3. See also col. 4, lines 30-33; col. 5, lines 16-21 & 35-37; and col. 6 lines 33-36. Applicant could find no teaching in the reference that a camera is chosen based on an *angle* between two imaginary lines, as recited in the claim. Consequently, claim 1 is patentable over the reference. Claims 3, 4, and 10, which depend on claim 1, are thus patentable for at least the same reasons as claim 1.

Claim 12 recites a "zoom-scale determination section" for

determining the *zoom scale* of *each* of the cameras which have been examined as being *optimal* for shooting the designated location by the camera to-be-operated determination section, *in a sequence* in which the cameras are *arranged*

(emphasis added). The cited reference does not teach these limitations of claim 12. The Examiner cites col. 6, lines 39-52 as teaching these limitations of the claim. However, a close reading of the cited section does not support the Examiner's assertion. It is true that the cited section discusses a *zooming* operation. However, the reference states that its zoom is determined for the camera with a proper field of view (lines 39-47) in order to present a "constant view height and width independent of the distance to the new target" (lines 50-52). There is no suggestion that the zoom scale is calculated for *each* of the cameras that are *optimal* or that this is done in a *sequence* in which the cameras are arranged, are recited in the claim. Hence, the reference does not teach all of the claim limitations, as required to anticipate the claim, and thus claim 12 is patentable over the reference.

Finally, claim 22 recites that "when cameras optimal for shooting the designated location are selected, images captured by the cameras are displayed at *respective scales*, *in a sequence in which the cameras are arranged*" (emphasis added). The reference does not teach the cited claim limitation.

The Examiner cites col. 6, lines 53-63 as teaching the cited claim limitation. However, that section merely states that when all monitors are active, that the monitor with the "lowest priority camera image will be connected to the new and higher priority camera image". There is no teaching that images are displayed at respective scales, in a sequence in which the cameras are arranged. Instead, the reference teaches using a *priority* sequence, which one skilled in the art would understand is quite different than the claimed operation of the invention. Thus, claim 22 is patentable over the reference because the reference does not teach all of the claim limitations.

In consideration of the foregoing analysis, it is respectfully submitted that the present application is in a condition for allowance and notice to that effect is hereby requested. If it is determined that the application is not in a condition for allowance, the examiner is invited

to initiate a telephone interview with the undersigned attorney to expedite prosecution of the present application.

If there are any additional fees resulting from this communication, please charge same to our Deposit Account No. 16-0820, our Order No. 32584.

Respectfully submitted,

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